

Exhibit C

to Hawkins Declaration

Plaintiffs' Motion for Class Certification

Michelo et al. v. Nat'l Collegiate Student Loan Trust 2007-2 et al., No. 18-CV-1781

Bifulco et al. v. Nat'l Collegiate Student Loan Trust 2004-2 et al., No. 18-CV-7692



NCO Financial Systems Attorney Network Standard Operating Procedures

*Attorney Network Services (ANS)
Standard Operating Procedures
Version 6.0*

Responsible Individual/Title: *Tanya McComb
Vice President, Audit & Compliance*

been closed on eRE. All Attorney Firms must dispute their right to fees or costs within 60 days of closure.

3.8 Lawsuit Process

3.8.1 Filing Suit

3.8.1.1 It is the responsibility of the Attorney Firm to determine suit worthiness on accounts using its best legal and business Judgment. See client specific guidelines located in **Appendix C and N**.

3.8.1.2 In addition to the legally mandated exclusion rules, i.e., SCRA, etc., the Attorney Firm will be responsible for applying any and all subjective suit decision criteria to all accounts placed by NCO. These items to consider include, but are not limited to: Suit Exclusions:

- 3.8.1.2.1.1 Bankruptcy
- 3.8.1.2.1.2 Deceased
- 3.8.1.2.1.3 Fraud claim and provides evidence
- 3.8.1.2.1.4 Active Military
- 3.8.1.2.1.5 Minor – Under the age of 18
- 3.8.1.2.1.6 Incarcerated
- 3.8.1.2.1.7 Receiving welfare
- 3.8.1.2.1.8 Receiving Social Security Income (as only income source)
- 3.8.1.2.1.9 Residing in assisted living development
- 3.8.1.2.1.10 Terminally ill
- 3.8.1.2.1.11 Seriously disabled
- 3.8.1.2.1.12 Temporary hardship, i.e. victim of natural disaster
- 3.8.1.2.1.13 Credit challenged, i.e. multiple judgments, tax liens, etc.
- 3.8.1.2.1.14 Outside Statue of Limitations (SOL)

3.8.2 All accounts forwarded should have a suit decision made and the legal process begun if applicable, within 45 days from placement, unless a payment arrangement has been agreed upon with the consumer or their representative. If an approved payment arrangement or court ordered payment stipulation is received, Attorney Firms must report the P-code CC:N115 via eRE and send a copy of the stipulation agreement to NSClient_services@ncogroup.com within 48 hours of receipt.

3.8.3 Accounts that are suit worthy in in serve first states should be sent for service within 45 days of placement.

3.8.4 NCO expects appropriate collection attempts to continue throughout the litigation process.

3.8.5 Attorney Firm is expected to pursue the borrower and co-borrower on National Collegiate Trust accounts. In some instances, the borrower and co-borrower may not reside in the same state. NCO will provide a P-code upon placement of a new file to advise of which borrower to pursue based on state of residence.

3.8.5.1 No P-code- Pursue the borrower;

3.8.5.2 P-code I150- Pursue the Co-Borrower1;

3.8.5.3 P-Code- I151- Pursue Co-Borrower2.

3.8.6 All collection notes must be updated via eRE using a W122 free form comment providing details on call attempts, call discussions, court approved payment plans, settlements, scheduled hearings, and counterclaims.

3.8.7 Attorney Firm will provide suit status updates to NCO within two business days of an effective date of action taken or notice of entry from a court. Suit status updates include, but are not limited to:

3.8.7.1 Date sent for service (Record Type 39/P-Code CC:L116 Summons Served).

3.8.7.2 CC:P110 –suit filed status updated via eRE

3.8.7.3 Suit Date (Record Type 41)

3.8.8 See client specific suit guidelines in **Appendix C, Appendix H, and Appendix M** concerning suit caption, affidavit process, and media availability.

3.9 Suit Dismissals

3.9.1 Upon notice of a Dismissal without prejudice, Attorney Firm must send either a status code P106 to keep the account or a close code C126 to close the account properly. Attorney Firm must also send a W122 with details on why the action was dismissed.

3.9.2 Dismissal Without Prejudice (DWOP) includes, but is not limited to:

3.9.2.1 Case dismissed for service issues;

3.9.2.2 Case dismissed for jurisdiction;

3.9.2.3 Case voluntarily dismissed; and

3.9.2.4 Mutual Dismissal Without Prejudice- still able to collect/proceed on account.

3.9.3 Upon notice of a Dismissal With prejudice, Attorney Firm must send a close code C125 to close the account properly. Attorney Firm must also send a W122 with details why the action was dismissed.

3.9.3.1 Dismissed With Prejudice (DWP) includes, but is not limited to:

3.9.3.1.1 Judgment for consumer;

3.9.3.1.2 Case dismissed after trial;